

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Hearing Date: April 2, 2025 at 9:30 a.m. (ET)

Re: D.I. 2178, 2293 & 2350

**STIPULATION OF FACT BETWEEN
DEBTORS, FORMAN MILLS INC. AND 1255 SUNRISE REALTY, LLC
FOR APRIL 2, 2025 HEARING**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), Forman Mills Inc. (“Forman Mills”) and 1255 Sunrise Realty, LLC (“Landlord,” together with the Debtors and Forman Mills, the “Parties”), by and through their undersigned counsel, hereby stipulate as follows with respect to the Debtors’ proposed assumption and assignment of the lease for Store # 1753, located at 1255 Sunrise Hwy Copiague, NY 11726, to Forman Mills, as set forth in the *Eighteenth Post-Closing Designation Notice* (D.I. 2178) (the “Designation Notice”) and the Landlord’s objection thereto (D.I. 2293) (the “Contested Matter”).

Solely for purposes of the hearing on the Contested Matter and any appeal or motion for reconsideration that may thereafter be filed, the Parties stipulate to the following:

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

1. On September 9, 2024, the Debtors commenced these chapter 11 cases by filing their voluntary petitions for relief under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”).

2. Landlord, as landlord, and Debtor Big Lots Stores, LLC, as tenant, are parties to that certain Store Lease dated as of December 13, 2002 for the property located at 1255 Sunrise Highway, Copiague, NY 11726 (designated by the Debtors as Store #1753 on the Designation Notice) (the “Copiague Lease”).

3. The Copiague Lease is a triple net lease with monthly base rent of \$29,927, plus CAM, real estate tax and insurance charges. Solely for purposes of establishing whether Forman Mills has provided adequate assurance of future performance under the Copiague Lease, the Parties agree that the total monthly rent obligation, inclusive of CAM, real estate tax and insurance charges, is approximately \$48,000-\$50,000.

4. The remaining term of the Copiague Lease runs through January 31, 2028 with no renewal options.

5. The Copiague Lease is a lease “of real property in a shopping center,” as that term is used in 11 U.S.C. § 365(b)(3).

6. An additional \$4,021.07 on account of 2024 CAM charges will be deemed added to the current proposed cure amount of \$12,728 (with respect to the unpaid portion of September 2024 rent) identified in the Designation Notice, for a total cure amount of \$16,749.07. In the event that the monthly rent for April 2025 remains unpaid as of any assumption date, then such rent shall be added to the cure amount.

7. Landlord acknowledges that the operation of a Forman Mills retail store at the above-referenced property would not violate the use restrictions in the Copiague Lease, and therefore is not challenging the proposed assumption and assignment on the basis of section 365(b)(3)(C) of the Bankruptcy Code.

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Dated: April 1, 2025

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